

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY, AARON WOLKIND,
STEVE HARTLEY, RICHARD SCHWETZ,
JOBEL BARBOSA, MATTHEW REIDINGER,
JOHN HUGO, SEAN-MICHAEL DAVID
SCOTT, THOMAS LOUDEN, ZACHARY REHL,
AMANDA REHL, K.R., a minor, by and through
her father ZACHARY REHL, and her mother
AMANDA REHL, MARK ANTHONY TUCCI,

Plaintiffs,

vs.

CHRISTIAN EXOO a/k/a ANTIFASH GORDON,
ST. LAWRENCE UNIVERSITY, TRIBUNE
PUBLISHING COMPANY, NEW YORK DAILY
NEWS, VIJAYA GADDE, TWITTER, INC.,
COHEN, WEISS AND SIMON, LLP, NICK
STRICKLAND, TORCH ANTIFA NETWORK,
UNNAMED ASSOCIATES 1-100,

Defendants.

CIVIL ACTION NO.:
2:20-cv-12880-
JMV-JAD

Hon. John M. Vazquez,
U.S.D.J.

Oral Argument Requested

Motion Date: February 22,
2022

PLEASE TAKE NOTICE that the Marlborough Law Firm, P.C., and Richard Torres, Esq. counsel for Defendant Christian Exoo ("Defendant"), shall move before the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, on February 22, 2022, at 9:00 a.m. or as soon thereafter as counsel may be heard, for the entry of an Order imposing sanctions against Plaintiffs and their counsel and awarding Defendant Exoo's counsel reasonable attorneys' fees and costs against Plaintiffs' counsel pursuant to Fed. R. Civ. P. 11(c), including but not

limited to the fees and costs relating to this motion, and an anticipated motion to strike and anticipated motion to dismiss to the extent the motions relate to the sanctionable conduct.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, Defendants shall rely upon the Memorandum of Law and Declaration of Christopher Marlborough submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

Dated: December 15, 2021
To Be Filed: January 6, 2022

By:



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